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Arizona Corporation Commission

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2007 AUG 23 5 21 PM LITCHFIELD PARK SERVICE COMPANY

12725 W. Indian School Rd., Suite D-101, Avondale, Arizona 85323

AUG 23 2007

June 27, 2007 AZ CORP COMMISSION
DOCKET CONTROL

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Arizona Corporation Commission
1200 West Washington
Phoenix, AZ 85007-2927Litchfield Park Services Company (LPSCO)
Docket No. SW-01428A-06-0444

Attention: Mr. Ernest Johnson, Director

RE: Incidents at Litchfield Park Services Co. (LPSCO) Palm Valley Water Reclamation Facility (PVWRF), Goodyear, AZ

Dear Mr. Johnson,

As requested, we are forwarding a summary of recent incidents that occurred at and associated with LPSCO's PVWRF in Goodyear, AZ.

On Thursday morning, June 21, 2007 overflow of wastewater took place at manholes at 4 commercial establishments on Litchfield Road in the City of Goodyear. With the assistance of the City of Goodyear, LPSCO was able to promptly contain and clean-up the spills..

On Saturday morning, June 23, 2007 a much smaller overflow of wastewater took place at 2 of the same commercial establishments on Litchfield Road and, again, with the assistance of the City of Goodyear, the spills were contained and quickly cleaned up. There was no disruption of wastewater service or interruption of customers to the commercial establishments. There was also no property damage.

These spills were reported as required to the Arizona Department of Environmental Quality and Maricopa County upon occurrence followed up by a Spill/Discharge Notification Memorandum, a copy of which is attached. Although there is no requirement in the Arizona Administrative Code (A.A.C.) to report such incidents to ACC, we followed our normal practice of voluntarily informing the ACC:

1. Email to Marlin Scott, Jr. at 4:21 PM, June 21, 2007 informing ACC of the first spill
2. Voice mail message to Marlin Scott, Jr on Saturday, July 23 informing ACC of second spill followed by report in person from Matt Garlick, Regional Manager, on Sunday, July 24, 2007.
3. Email to Marlin Scott, Jr. on June 25, 2007 at 4:29 PM the details of Item 2 above.

Investigations to date show the causes in both cases were failure of plant automated alarms to transfer call out to the on call operators and possible human failure. A second level of redundancy alarms is being designed and installed. Investigation of employees is on-going and

measures including additional training, discipline and dismissal will be applied, as appropriate.

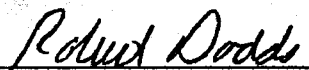
At 11:15 AM on Sunday, June 24, 2007 the fire sprinkler system in the blower room at PVWRF was activated due to a fire in the motor of one of 5 blowers. The sprinkler system automatically put out a 3 alarm fire warning and the Plant Operator on duty also called emergency services at the same time. The response of the fire departments was quick and even though fire sprinkler system had extinguished the fire in the blower motor, the power to PVWRF had to be cut off to allow firemen safe access to the blower room for inspections. PVWRF was off line for approximately 1 hour but there was no spill caused as a result.

This incident was reported to Marlin Scott, Jr., as required under A.A.C. R14-2-101B where there is more than an estimated \$5,000 in damage, in email on June 24, 2007 at 3:13 PM. Another email was sent on June 25, 2007 at 3:36 PM to upgrade the cost estimate to \$60,000 to \$65,000 after discussion with replace equipment suppliers.

Algonquin Water Services (AWS), operator of LPSCO and 6 other utilities in Arizona, is currently working with ACC staff to establish a call in line and process for reporting, both when reporting is required by the rules and when reports are being provided voluntarily..

Please contact the undersigned at your convenience if further information is required.

Yours very truly,
LITCHFIELD PARK SERVICES CO.


Robert B. Dodds, President

SPILL/DISCHARGE NOTIFICATION MEMORANDUM

- ☐ If spill occurs in Maricopa, Gila, Pinal, La Paz or Yuma county, please notify the Central Office at (602) 771-4620, Fax 602-771-4505 and mail to: Manager, Water Quality Field Services Unit, Arizona Department of Environmental Quality, 1110 West Washington, Phoenix, AZ 85007
- ☐ If spill occurs in Mohave, Coconino, Yavapai, Navajo or Apache county, please notify the Northern Regional Office at (520) 779-0313, Fax 520-773-2700 and mail to: Manager, Northern Regional Office, Arizona Department of Environmental Quality, 1515 E. Cedar Avenue, Suite F, Flagstaff, AZ 86004
- ☐ If spill occurs in Pima, Cochise, Santa Cruz, Graham or Greenlee county, please notify the Southern Regional Office at (520) 628-6733, Fax 520-628-6745 and mail to: Manager, Southern Regional Office, Arizona Department of Environmental Quality, 400 W. Congress, Ste. 433, Tucson, AZ 85701

From: Palm Valley Water Reclamation Facility (LPSCO)

Date: 21

June 2007

UNAUTHORIZED SEWAGE SPILL/DISCHARGE REPORT

Facility Name: Palm Valley Water Reclamation Facility Facility Address: 14222 W McDowell Rd Facility No.: 100310

Contact Name: Clint Amdt Contact phone #: 623-293-3056

This will voluntarily inform ADEQ of an unauthorized sewage spill/discharge which occurred from the referenced facility and/or the collection system as specified below:

Date(s): 21 June 07 Known Time (from-to): reported 6-20-07 @ 1030hrs - stopped 6-21-07 1430 and 6-23-07 from 1300hrs to 1600hrs.

Location(s): Behind Denny's Restaurant and Cracker Barrel Restaurant on Litchfield Park Rd.

Discharge reached "waters of the U.S." ? (Circle one) Yes ☐ No ☒ (Name of receiving stream/wash):

Was the U.S. EPA notified of the spill (required, if it reached "waters of the U.S.")? (Circle one) Yes ☐ No ☒

Approximate volume of discharge (# gallons discharged): 25,000 USG

When and how did you become aware of the discharge?

At approximately 2204hrs on 20 June 2007, LPSCO on call operators were informed of a water leak behind Denny's restaurant. Upon arrival of the first on call operator, sewage was found seeping from a manhole. Cause of the overflow was found to be at the Water Reclamation Facility. One of the three Disk Filters had tripped, went off line and failed to alarm or call out the on call staff. This caused the two remaining filters to plug and influent flow to back up. The filters were reset and the plant was restored. The sewage spill was limited to approximately 100 USG. Operators continued to work all night to bring levels down. Unfortunately we were not able to get levels low enough to keep ahead of the morning high flows. At approximately 1100hrs on June 21 sewage started overflowing manholes behind the Cracker Barrel Restaurant and behind Denny's Restaurant. With the City of Goodyear's assistance we immediately brought in 4 - Vac Trucks, 2 - 4000 gallon Tanker Trucks and 7 - 6000 gallon Tanker Trucks. These overflows lasted for approximately 10-20 minutes every 60 minutes until approximately 1400hrs. All of the areas affected were chlorinated during and after the overflows occurred. Complete clean up was completed at approximately 2000hrs.

On June 22, 2007 at approximately 2115hrs the UV units at the Palm Valley Water Reclamation Facility faulted and tripped, this shut down effluent flow from the facility and caused the plant to back up. Due to communication problems the SCADA alarm system was unable to contact the on call staff. At 0230hrs on June 23, 2007 the first

plant operator arrived on site and found the problem. The problem was resolved and plant flow was restored. The Operator began to lower plant levels as quickly as possible. However the morning's high surge caught us again, and at approximately 1300hrs sewage spilled from the manholes behind the Cracker Barrel Restaurant and behind Denny's Restaurant. This event lasted for approximately 5 minutes and spilled approximately 500 USG. We immediately brought in 4 - Vac Trucks, 2 - 4000 Tanker Trucks and 4 - 6000 gallon Tanker Trucks. All of the areas affected were chlorinated during and after the overflow occurred. Complete clean up was completed at approximately 1600hrs.

The cause of the discharge/determined by:

Personnel issues and communication problems with the phone system.

Remedial/Mitigative/Corrective Actions:

The phone companies were notified of the problems we had on 6-23-07. They responded and repaired the problem 6-23-07. We also brought in a SCADA specialist from Wunderlich - Malich to go through our SCADA system to confirm that it is working correctly. The response of LPSCO employees is being investigated which may lead to more training, discipline and dismissal, as appropriate.